### IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TENNESSEE WESTERN DIVISION

JESSICA JONES, MICHELLE VELOTTA, and CHRISTINA LORENZEN on Behalf of Themselves and All Others Similarly Situated,

Case No. 2:20-cv-02892-SHL-cgc

Plaintiffs.

v.

VARSITY BRANDS, LLC; VARSITY SPIRIT, LLC; VARSITY SPIRIT FASHION & SUPPLIES, LLC; U.S. ALL STAR FEDERATION, INC.; JEFF WEBB; CHARLESBANK CAPITAL PARTNERS LLC; and BAIN CAPITAL PRIVATE EQUITY,

**JURY DEMAND** 

Defendants.

#### PLAINTIFFS' MOTION FOR LEAVE TO EXTEND THE FILING DEADLINE

Indirect Purchaser Plaintiffs Jessica Jones, Michelle Velotta, and Christina Lorenzen (collectively "Plaintiffs"), on behalf of themselves and all others similarly situated, hereby move this Court, for leave to file certain non-dispositive motions later than the Court's deadline of September 17, 20221 at 11:59 PM, and pursuant to Civil Local Rules 12. Plaintiffs seek to extend the deadline until September 18, 2021 at 11:59 PM, Memphis time.

Plaintiffs respectfully move the Court to allow filing of the following motions: 1)

Plaintiffs' Motion to Compel Discovery Reponses from Varsity Defendants; 2) Plaintiffs' Motion to Compel Discovery Responses from Defendant Jeff Webb; 3); Plaintiffs' Motion to Compel Discovery Responses from Defendant Bain Capital Private Equity and 4); Plaintiffs' Motion to Compel Discovery from Defendant Charlesbank Partners LLC, as well as the Declaration of Kevin R. Rayhill in support of all four motions, and all accompanying papers required under the

Local Civil Rules.

Plaintiffs made best efforts and had every intention of all papers being filed before the deadline. However, Plaintiffs encountered a number of unexpected staffing, health, logistical, and technical issues, which prevented timely filing and apologize for missing the deadline. Plaintiffs have reached out to defense counsel to express their apology and would gladly, with the Court's permission, offer an additional three days for all opposition papers to adjust for the late filing and inconvenience. Plaintiffs had not yet heard back from defense counsel at the time of this filing.

Plaintiffs respectfully request that the Court GRANT the instant Motion and accept the motions and papers, filed herewith.

Dated: September 18, 2021 Respectfully submitted,

By: /s/ Joseph R. Saveri
Joseph R. Saveri

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# **CERTIFICATE OF SERVICE**

I hereby certify that on September 18, 2021, I served a copy of the foregoing document via the Court's ECF system, effecting service on all interested parties.

/s/ Joseph R. Saveri
Joseph R. Saveri